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July 15, 2025

Via ECF and Fax

Hon. Alvin K. Hellerstein
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10019
(f) 212-805-7942

*Re: Damien Jones as putative administrator of the estate of William Brown v.
City of New York et al. – 24-cv-09408*

Dear Judge Hellerstein:

This firm represents Plaintiff Damien Jones in the above-captioned case. We write to request an eight-week adjournment of the July 18, 2025 status conference to September 12, 2025 or any date thereafter convenient for the Court. Counsel for the City of New York, Alexandra Corsi, and counsel for Defendants Nikita Hercules and Irwin DeLeon, John Burns, consent to this request for an adjournment.

As the Court is aware, this case was filed on behalf of Damien Jones as the putative administrator of William Brown's estate. Mr. Jones had filed a petition for letters of administration in the King's County Surrogate's Court prior to the commencement of this action but had not yet been appointed administrator of Mr. Brown's estate. The reason for this adjournment request is the ongoing proceedings in Kings County Surrogate's Court. Since the parties' last status conference before the Court on May 30, 2025, the Surrogate's Court has not yet appointed an administrator of William Brown's estate. However, Plaintiff's counsel has been diligently pursuing additional information about William Brown's family, per the Surrogate's Court's request, and we expect there to be additional action from the Surrogate's Court in the coming two months.

*This status conf. is
adjourned, from 7/18/25
to Oct. 7, 2025, 10⁰⁰
7-15-25
Chk. Hellerstein*

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Accordingly, counsel for Plaintiff requests an eight-week adjournment of the status conference currently set for July 18, 2025. At that time, we expect to be able to provide a more fulsome update to the Court as to the status of the Surrogate's Court proceedings. We thank the Court for its consideration of this request.¹

Sincerely,

/s/
Katherine Rosenfeld
Laura S. Kokotailo

c. All counsel of record, via ECF

¹ As per the Court's July 1, 2025 Order, Dkt. 30, the parties submit the attached amended joint case management plan.